

1 The Honorable James L. Robart  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 CAROLINE ANGULO, a single person, ERIC  
10 KELLER, a single person, ISABEL LINDSEY  
11 and CHARLES LINDSEY, a married couple,  
12 and CHRISTINE BASH, individually and as a  
13 personal representative of the ESTATE OF  
14 STEVEN BASH,

15 Plaintiffs,

16 v.

17 PROVIDENCE HEALTH & SERVICES –  
18 WASHINGTON, a non-profit Washington  
19 corporation, also d/b/a PROVIDENCE ST.  
20 MARY MEDICAL CENTER; DR. JASON A.  
21 DREYER, D.O., and JANE DOE DREYER,  
22 husband and wife and the marital community  
23 thereof; DR. DANIEL ELSKENS, D.O., and  
24 JANE DOE ELSKENS, husband and wife and  
25 the marital community thereof; and JOHN/JANE  
26 DOES 1-10, and any marital communities  
27 thereof,

Defendants.

No. 2:22-cv-00915-JLR

STIPULATED MOTION AND  
[PROPOSED] ORDER TO  
EXTEND DEADLINE TO  
SUBMIT JOINT STATEMENT

NOTE ON MOTION CALENDAR:  
June 16, 2023

**STIPULATED MOTION**

22 In its Order dated May 15, 2023, the Court directed the parties to file a joint statement by  
23 June 16, 2023, discussing their proposals for the jurisdictional discovery process and remaining  
24 areas of dispute. Dkt. 79 at 11. The Parties have worked diligently to prepare their joint  
25 statement, but Providence's proposed administrator for the jurisdictional process (Angeion  
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STIPULATED MOTION AND [PROPOSED] ORDER  
TO EXTEND DEADLINE TO SUBMIT JOINT STATEMENT  
(2:22-cv-00915-JLR)

1 Group) withdrew its bid to serve as administrator on the morning of this filing. Given Angeion  
2 Group's withdrawal and Providence's need to propose alternative administrator(s), the Parties  
3 request additional time to revise their joint statement for submission. Accordingly, the Parties  
4 ask that the Court extend the deadline for the Parties to file their joint statement to no later than  
5 June 21, 2023.

6 IT IS SO STIPULATED

7 RESPECTFULLY SUBMITTED this 16th day of June, 2023.

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30 STIPULATED MOTION AND [PROPOSED] ORDER  
31 TO EXTEND DEADLINE TO SUBMIT JOINT STATEMENT  
(2:22-cv-00915-JLR)

**[PROPOSED] ORDER**

It is so ordered.

DATED this 16th day of June, 2023.



Jim R. Blint

THE HONORABLE JAMES L. ROBART  
UNITED STATES DISTRICT JUDGE

STIPULATED MOTION AND [PROPOSED] ORDER  
TO EXTEND DEADLINE TO SUBMIT JOINT STATEMENT  
(2:22-cv-00915-JLR)

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I had the foregoing electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED: June 16, 2023

s/ Ross Siler  
Ross Siler, WSBA #46486

STIPULATED MOTION AND [PROPOSED] ORDER  
TO EXTEND DEADLINE TO SUBMIT JOINT STATEMENT  
(2:22-cv-00915-JLR)